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**BY ECF** 

## MEMO ENDORSED

Hon. Barbara Moses Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Re: Keep On Kicking Music, Inc., et al. v. Universal Music Group, Inc., et al.,

1:23-cv-04400-JPO-BCM

Dear Judge Moses:

We represent defendants UMG Recordings, Inc., Universal Music Corp., Universal Music Group, Inc., and Quality Control Music, LLC. We write concerning the status conference currently scheduled for February 25, 2025. In light of today's Order by Judge Oetken, granting the motion to withdraw filed by Plaintiffs' last remaining counsel, *see* 2/14/25 Minute Entry, we respectfully request that the Court adjourn the status conference (and the deadline for the parties' joint preconference letter) until after April 10, 2025, which is the date that Plaintiffs' new counsel has been ordered to appear, *see* Dkt. 128.

Defendants Melodie Makers, Inc., Kreyol Music, Inc., and Robert Martino consent to this request. There has been one previous request for an adjournment of these dates, which the Court granted. *See* Dkt. 120. If the Court grants this request, no other deadlines will be affected.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Adam I. Rich

Adam I. Rich

Application GRANTED. The status conference previously scheduled for February 25, 2025 is hereby ADJOURNED to April 23, 2025 at 11:00 a.m. The parties' joint pre-conference letter is due no later than April 16, 2025. The Clerk of Court is respectfully directed to close the motion at Dkt. 131. SO ORDERED.

Barbara Moses

United States Magistrate Judge

February 18, 2025

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